

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION

<b>TINA RAY,</b>	)	
	)	
Plaintiff,	)	CAF No.: 5:17-cv-00093-EKD
	)	
v.	)	
	)	
<b>MICHAEL ROANE,</b>	)	
in his individual capacity,	)	
	)	<b>JURY TRIAL DEMANDED</b>
Defendant.	)	

**(UNCONTESTED) MOTION FOR LEAVE TO DEPOSE INMATES**  
**STEPHANIE HAGY AND ADAM HICKS**

Plaintiff, Tina Ray, by and through undersigned counsel, pursuant to Fed. R. Civ. P. 30(a)(2)(B), files this Motion for Leave to depose Stephanie Hagy and Adam Hicks, inmates currently housed at Middle River Regional Jail, 350 Technology Drive, Staunton, VA 24401, at their place of incarceration. In support of this Motion, Plaintiff states:

1.

On September 27, 2017, Plaintiff filed the Complaint initiating this action. (ECF 1.) The Complaint relates to the death of Plaintiff's dog, Jax, by Defendant Officer Michael Roane on September 24, 2017. (ECF 1, 6.).

2.

The proposed deponents are witnesses present on the date that Jax was killed. As such, the deponents have information relevant to the case that can be discovered by no other means.

3.

The parties have agreed upon a deposition date.

4.

Captain Powell of Middle River Regional Jail was contacted and does not object to these depositions.

WHEREFORE Plaintiff respectfully requests that this Court enter an Order Granting this Motion, permitting the deposition of Stephanie Hagy and Adam Hicks, and granting such other and further relief as is just and proper.

Respectfully submitted this 21<sup>st</sup> day of October 2021.

/s/MARIO B. WILLIAMS

Mario B. Williams

Va. Bar No. 91955

/s/ DALLAS S. LEPIERRE

Dallas S. LePierre

Fl. Bar No. 101126

**HDR, LLC**

44 BroadStreet, NW, Suite 200

Atlanta, Georgia 30303

404-254-0442 / 404-935-9391 FAX

mwilliams@hdrattorneys.com

dlepierre@hdrattorneys.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing to the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

Respectfully submitted this 21<sup>st</sup> day of October 2021.

/s/MARIO B. WILLIAMS

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